

## REMARKS

Applicants respectfully request reconsideration of the present U.S. Patent application.  
Claims 1-9, 16-19, and 25-35 are pending.

### Claim Rejections - 35 U.S.C. § 102

Claims 1-7, 9, 16, 17, 19, 25-27, 29, 30, 32, 33, and 35 are rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,253,243 B1 issued to Spencer.

Claim 1 recites the following:

detecting alert events on a client using a platform independent agent integrated with said client;  
reporting detected alert events by said platform independent agent to a remote alert proxy in a platform independent manner complemented by a platform type;  
obtaining an identifier from the reported detected alert events;  
mapping the identifier to a representation of a specific platform type; and  
translating said reported alert events to platform specific alert events via said alert proxy by referring to a specific section of an event description file using the mapped representation.

Claims 16, 25, 27, 29, and 32 similarly recite translating said reported alert events to platform specific alert events via said alert proxy by referring to a specific section of an event description file using the mapped representation.

Spencer discloses a system for an automated trap control for a distributed network management system. The Office Action states that Spencer discloses translating said reported alert events to platform specific alert events via said alert proxy by referring to a specific section of an event description file using the mapped representation at col. 2, lines 5-17 and col. 9, lines 24-42. However, the cited text only discloses receiving an SNMP compliant PDU and converting the PDU so that it is compliant with the CMIP protocol. Col. 9, lines 24-42 of

Spencer further discloses that the translation between SNMP traps and CMIP event notifications is controlled by the trap\_maps file. For example, the format of the trap\_maps file may be modified to include “wildcard” elements to “match anything” (col. 9, lines 38-43). However, the trap\_maps file described in Spencer does not describe the alert events. Therefore, Spencer does not disclose an event description file or referring to a specific section of an event description file using the mapped representation via an alert proxy. Thus, Spencer does not disclose translating said reported alert events to platform specific alert events via said alert proxy by referring to a specific section of an event description file using the mapped representation. This limitation is recited in claims 1, 16, 25, 27, 29, and 32. Therefore, Applicants submit that claims 1, 16, 25, 27, 29, and 32 are not anticipated by Spencer.

Claims 2-9, 17-19, 26, 28, 30-31, and 33-35 are dependent claims and distinguish for at least the same reasons as their independent base claim in addition to adding further limitations of their own. Therefore, Applicants submit that Spencer does not anticipate claims 2-9, 17-19, 26, 28, 30-31, and 33-35 for at least the reasons set forth above.

#### Claim Rejections - 35 U.S.C. § 103

Claims 8, 18, 28, 31, and 34 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,253,243 B1 issued to Spencer in view of U.S. Patent No. 5,689,708 A issued to Regnier et al.

As discussed above, Spencer does not disclose, teach, or suggest translating said reported alert events to platform specific alert events via said alert proxy by referring to a specific section of an event description file using the mapped representation.

The Office Action states that Regnier teaches referencing a plain text "ini" file. Whether or not Regnier teaches this feature, Regnier does not disclose, teach, or suggest translating said reported alert events to platform specific alert events via said alert proxy by referring to a specific section of an event description file using the mapped representation. This limitation is recited in claims 1, 16, 25, 27, 29, and 32. Therefore, Regnier does not cure the deficiencies of Spencer. Thus, Applicants submit that claims 1, 16, 25, 27, 29, and 32 are patentable over Spencer and Regnier.

Claims 2-9, 17-19, 26, 28, 30-31, and 33-35 are dependent claims and distinguish for at least the same reasons as their independent base claim in addition to adding further limitations of their own. Therefore, Applicants submit that claims 2-9, 17-19, 26, 28, 30-31, and 33-35 are patentable over Spencer and Regnier for at least the reasons set forth above.

### Conclusion

In view of the remarks set forth above, Applicants submit that claims 1-9, 16-19, 25-35 are in condition for allowance and such action is respectfully solicited. The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages and credit any overcharges to our Deposit Account number  
02-2666.

Respectfully submitted,  
**BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN, LLP**

Date: 2/19/04

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